

<p>1 the context of his question?</p> <p>2 MR. SABA: Thank you. It's my deposition, not</p> <p>3 your deposition. You can ask him questions,</p> <p>4 Michael. The issue is -- he indicated he</p> <p>5 understands --</p> <p>6 MR. CIOFFI: You've asked the question three</p> <p>7 times --</p> <p>8 MR. SABA: It's not if you understand.</p> <p>9 MR. CIOFFI: Emphasizing the word necessary.</p> <p>10 MR. SABA: No, I haven't.</p> <p>11 MR. CIOFFI: You have. You're using it as a</p> <p>12 term of art. That's the point of the objection.</p> <p>13 MR. SABA: No, I'm not. I asked if he</p> <p>14 understands. He understands. Whether or not you</p> <p>15 want to interrupt and put your own answer in is</p> <p>16 not -- it's not appropriate.</p> <p>17 MR. CIOFFI: The objection is our only way to</p> <p>18 have a clear record. If you can answer the</p> <p>19 question, answer the question.</p> <p>20 THE WITNESS: Let me -- let me try and answer</p> <p>21 the question, what I think you're referring.</p> <p>22 The board's not required to have an</p> <p>23 independent third-party assessment. The board</p> <p>24 elected and they felt that -- that as a good part</p> <p>25 of their due diligence in assessing talent that</p>	<p>Page 52</p> <p>1 MR. CIOFFI: Yeah, objection to the form of</p> <p>2 the question. Calls for speculation.</p> <p>3 THE WITNESS: I won't speculate. I can't</p> <p>4 answer. This is a board process. They take it</p> <p>5 very seriously. We have a lot of very successful</p> <p>6 board members who take this job very seriously.</p> <p>7 They're independent. I don't rubber stamp</p> <p>8 anything. This was not my recommendation. This</p> <p>9 was the board's decision. The board wanted RHR. I</p> <p>10 have no clue whether they felt that that was a</p> <p>11 mandated requirement, that they had to do it. They</p> <p>12 did it. It was a request.</p> <p>13 BY MR. SABA:</p> <p>14 Q. Referring back to paragraph 11, the first</p> <p>15 sentence reads, the bank did not conceal this vetting</p> <p>16 activity, which was widely known across the bank. What</p> <p>17 does that mean, it was "widely known across the bank"?</p> <p>18 A. Once again, this was written some time ago,</p> <p>19 but what I believe that -- widely known across the bank,</p> <p>20 is that when they brought in RHR as part of the vetting</p> <p>21 process with Tim Spence, right, that process involved</p> <p>22 peers being interviewed by RHR, Guy in particular,</p> <p>23 Odyne. It also involved subordinates, reports of Tim</p> <p>24 Spence, being interviewed as part of the process. It</p> <p>25 involved a lot of things, reaffirming the CEO profile,</p>
<p>1 would be the next CEO of the company, you get a</p> <p>2 third-party opinion, understand how that</p> <p>3 individual, against their database of other CEOs</p> <p>4 would stack up, and Tim stacked up exceptionally</p> <p>5 well top core down. All right?</p> <p>6 They wanted that confirmation. They felt that</p> <p>7 they would like to have that confirmation and</p> <p>8 validation. That was their decision. Whether it</p> <p>9 was necessary or not, they obviously wanted to do</p> <p>10 it. Whether they thought that was necessary or</p> <p>11 not, that was the board's decision. I wasn't in</p> <p>12 that conversation.</p> <p>13 BY MR. SABA:</p> <p>14 Q. You were a member of the board at that time,</p> <p>15 correct?</p> <p>16 A. I was a member of the board, but not -- when</p> <p>17 the board has an executive session, I step out. So I am</p> <p>18 not in an executive session of independent directors</p> <p>19 where those conversations could happen.</p> <p>20 Q. With respect to -- let me -- let me ask you</p> <p>21 this a different way.</p> <p>22 Was -- was Tim Spence going to be made</p> <p>23 president of Fifth Third Bank without being vetted by</p> <p>24 RHR?</p> <p>25 A. I can't answer that.</p>	<p>Page 53</p> <p>1 the winning formula.</p> <p>2 So that was known, and I think they brought in</p> <p>3 quite a few of his peers and quite a few of his direct</p> <p>4 reports. So when it says it was known, it was also</p> <p>5 known to Phil McHugh that Tim was being put through the</p> <p>6 vetting process. Phil McHugh was part of the vetting</p> <p>7 process. Phil McHugh didn't have any objections. When</p> <p>8 you look at the feedback that was -- that was --</p> <p>9 that was put together by RHR from his peers and his</p> <p>10 subordinates, Tim got very high marks, all right? There</p> <p>11 was no one stepping up and saying this person was not</p> <p>12 the right individual to become the CEO or president of</p> <p>13 the company.</p> <p>14 So when I say it was known, there was many</p> <p>15 people involved in this vetting process of Tim for the</p> <p>16 next president of Fifth Third Bank.</p> <p>17 Q. All right. Did you have any conversations</p> <p>18 with Phil McHugh about him being involved in the vetting</p> <p>19 process by RHR of Tim Spence for president of Fifth</p> <p>20 Third Bank?</p> <p>21 A. I believe that I spoke with each one of Tim's</p> <p>22 peers to let them know that they would be involved in</p> <p>23 this process. It would have been irresponsible of me</p> <p>24 not to communicate to them that this process was going</p> <p>25 to take place and that they would be involved in this</p>
<p>Page 54</p>	<p>Page 55</p>

<p>1 process. I would not want them surprised by someone 2 from the outside reaching in to them and out to them and 3 asking them for information on a peer of theirs without 4 understanding the process. 5 So as I would always do, I would absolutely 6 have talked to each of these individuals that was a peer 7 of Tim Spence and informed them of the process and what 8 was going to take place. 9 Q. When did you have this conversation with Phil 10 McHugh? 11 A. I can't answer that question. I don't have 12 the -- I don't have that in front of me. 13 Q. What do you recall about the conversation you 14 had with Phil McHugh, about RHR vetting Tim Spence? 15 A. I don't -- I don't really recall the 16 conversation with respect to -- I just let them know it 17 was going to -- it was going to transpire. I don't 18 recall Phil reacting -- Phil McHugh reacting to that, 19 those statements. He never said -- he definitely never 20 said why am I not being vetted? Why am I not being 21 considered for the president because you've -- you've 22 promised me in some way that I would be that? Never a 23 conversation of that nature. 24 I would have informed him it was going to 25 happen, and I think he acknowledged that. He didn't</p>	<p>Page 56</p> <p>1 going to want an interview. That's the only 2 conversation I had. 3 BY MR. SABA: 4 Q. And that conversation, was that documented 5 anywhere in writing? 6 A. I did not document every one of these 7 conversations with every one of his peers or 8 subordinates if I talked to them. I just informed them 9 that was going to happen. I did not write anything 10 down. 11 Q. Did you indicate to any of these individuals 12 that Tim is -- the timing for when Tim would be 13 succeeding you as president and CEO? 14 A. It's not my decision. That's the board's 15 decision. I would never ever talk about the timing of a 16 decision of that nature when it's not my decision. It's 17 the board's decision. 18 I'm going back; RHR would have required me, by 19 the way, in conversations with Guy, to make sure 20 that these individuals were going to be informed that 21 they were going to be getting a phone call from his 22 organization. 23 So that is what -- also, as I remember back, I 24 would have did it anyway, but he reminded me it has to 25 be done before he makes a call in to them so they're not</p> <p>Page 58</p>
<p>1 come back and ask me or why this or why that? He said 2 he would -- he would talk to him when he call him. 3 That's what I remember. 4 Q. Do you recall anything specifically that was 5 said during that conversation? 6 MR. CIOFFI: Objection. He just answered the 7 question. 8 MR. SABA: He told me what wasn't said. I'm 9 trying to -- I'm trying to have you tell me what 10 specifically was said. 11 THE WITNESS: I cannot recall anything Phil 12 said except where he would be prepared to take the 13 conversation and participate. I'm not aware of 14 anything more than that, and I cannot recall 15 anything more than that about that conversation. 16 BY MR. SABA: 17 Q. Can you recall anything you specifically said? 18 MR. CIOFFI: Objection. He answered the 19 question. 20 THE WITNESS: I just informed him that this 21 process was going to take place, that Tim was being 22 assessed by a third party for potential president 23 of CEO -- of Fifth Third Bank, and that they would 24 be part of that vetting process. And you would -- 25 so expect a call from this individual and he's</p>	<p>Page 57</p> <p>1 surprised, so. 2 Q. So with respect to these conversations you had 3 with these individuals, you wouldn't have necessarily 4 indicated any timing of when Tim Spence would become 5 president and/or CEO -- 6 MR. CIOFFI: Objection. Asked and answered. 7 Counsel, you -- you keep repeating questions, and 8 I'll remind you of the court's order. You're only 9 permitted to go a second day if the questions 10 aren't redundant. This is sort of the third time 11 you've asked him that question. 12 MR. SABA: They're not redundant questions. 13 MR. CIOFFI: He can answer. 14 It is a redundant question. The record will 15 speak for itself. I mean, it's not the only 16 redundant question in the first hour. 17 MR. SABA: Michael -- 18 MR. CIOFFI: Could you repeat the question, 19 please? 20 (The record was read.) 21 MR. CIOFFI: Objection. Asked and answered. 22 Twice already. But you may answer it again. 23 THE WITNESS: I would never provide timing to 24 anybody when I don't know the timing myself. 25 And this is a decision the board makes. And</p> <p>Page 59</p>

<p>Page 60</p> <p>1 obviously, the vetting process is the vetting</p> <p>2 process, and the board makes decisions based on the</p> <p>3 outcomes of those processes.</p> <p>4 BY MR. SABA:</p> <p>5 Q. During this conversation you had with Phil</p> <p>6 McHugh about the vetting process, did you specifically</p> <p>7 indicate to him that he was not being considered for</p> <p>8 president and/or CEO?</p> <p>9 A. I would never have that conversation about him</p> <p>10 not being vetted for CEO or president because he was</p> <p>11 never considered. He knows he was never considered, all</p> <p>12 right? That's why he never responded back when I told</p> <p>13 him that RHR was coming in to assess Tim and vet Tim; he</p> <p>14 never once said why not me, because he was never being</p> <p>15 considered. He knew he wasn't being considered because</p> <p>16 he wasn't qualified. At no discussion ever with Phil</p> <p>17 McHugh did we ever talk about him being the permanent</p> <p>18 future leader of Fifth Third Bank as a CEO. We never</p> <p>19 had a conversation of that nature. Never happened.</p> <p>20 Q. Did you, during this conversation you had with</p> <p>21 Phil McHugh about Tim Spence being vetted by RHR -- did</p> <p>22 you indicate to Phil McHugh that you were not going to</p> <p>23 recommend him as president and CEO succeeding you?</p> <p>24 A. I never had a conversation about recommending</p> <p>25 him as president/CEO succeeding me. The only</p>	<p>Page 62</p> <p>1 Who is that referring to, "the same protected</p> <p>2 age classification" as whom?</p> <p>3 MR. CIOFFI: Objection. It calls for a legal</p> <p>4 conclusion. If you can answer.</p> <p>5 THE WITNESS: I would just be making -- I</p> <p>6 mean, I would assume we're talking about Phil</p> <p>7 McHugh here, same protected class. That's an</p> <p>8 assumption, but I don't -- I don't know why else it</p> <p>9 would be in there.</p> <p>10 BY MR. SABA:</p> <p>11 Q. What is your understanding of what constitutes</p> <p>12 age discrimination?</p> <p>13 MR. CIOFFI: Objection. Calls for a legal</p> <p>14 conclusion.</p> <p>15 BY MR. SABA:</p> <p>16 Q. I'm asking for your understanding. Go ahead.</p> <p>17 MR. CIOFFI: Well, his understanding is</p> <p>18 irrelevant, Counsel, and it's beyond the scope of</p> <p>19 discovery.</p> <p>20 MR. SABA: Go ahead.</p> <p>21 MR. CIOFFI: If you can answer.</p> <p>22 THE WITNESS: Discrimination of an action,</p> <p>23 someone that is, legally, I guess, above 40 years</p> <p>24 old, that you're -- you're doing and taking an</p> <p>25 action, based on their age, that's detrimental to</p>
<p>Page 61</p> <p>1 conversation that ever occurred with Phil McHugh was</p> <p>2 would he be interested, if something happened to me and</p> <p>3 I had to step out, would he be interested to be</p> <p>4 considered as an emergency successor if the board wanted</p> <p>5 him to step into that role? It's a board decision</p> <p>6 again. My job is to make sure that the individual would</p> <p>7 be willing to do that as an emergency successor. That's</p> <p>8 keeping the lights on, keeping the trains on the track,</p> <p>9 keeping things moving forward until the board completed</p> <p>10 their process. That was the only conversation, ever, I</p> <p>11 had with Phil McHugh about, quote, CEO job, and it was</p> <p>12 an emergency successor.</p> <p>13 MR. SABA: If we can go off the record.</p> <p>14 THE VIDEOGRAPHER: It's 10:56 a.m. We're</p> <p>15 going off the record.</p> <p>16 (A recess was taken from 10:56 to 11:14.)</p> <p>17 THE VIDEOGRAPHER: The time is 11:14 a.m.</p> <p>18 We're back on the record.</p> <p>19 BY MR. SABA:</p> <p>20 Q. Mr. Carmichael, referring you back to</p> <p>21 Exhibit 2, paragraph number 10 of the counterclaim, and</p> <p>22 I'm on page 21.</p> <p>23 The last sentence of paragraph 10 reads,</p> <p>24 Mr. Spence is in the same protected age classification</p> <p>25 of over 40.</p>	<p>Page 63</p> <p>1 them, would be my understanding of age</p> <p>2 discrimination. You're making decisions based on</p> <p>3 age.</p> <p>4 BY MR. SABA:</p> <p>5 Q. Did you believe that, because Tim Spence was</p> <p>6 over the age of 40, that you were free to make a</p> <p>7 decision based upon age with respect to Phil McHugh?</p> <p>8 MR. CIOFFI: Objection. Assumes facts not in</p> <p>9 evidence, and no decision was -- was based on age.</p> <p>10 That's what he just testified to. Could you repeat</p> <p>11 -- read the question back.</p> <p>12 MR. SABA: Re-read the question, then.</p> <p>13 (The record was read.)</p> <p>14 THE WITNESS: Yes.</p> <p>15 BY MR. SABA:</p> <p>16 Q. Did you believe that, because Tim Spence was</p> <p>17 over the age of 40, that you were free to make a</p> <p>18 decision regarding Phil McHugh, based upon age?</p> <p>19 A. I don't ever make age a factor in any</p> <p>20 discussion on this topic. This is -- at the end of the</p> <p>21 day, it's based on qualifications. Phil was not</p> <p>22 qualified for the CEO, so he was never considered. It</p> <p>23 had nothing do with his age. He just wasn't qualified.</p> <p>24 I can give you all the examples of why he wasn't</p> <p>25 qualified. I'm sure you'll ask.</p>

<p>1 But at the end of the day, I don't make 2 decisions based on age, and we didn't do anything with 3 respect to succession planning because of Tim's age or 4 Phil's age. 5 Q. Is age included in a factor with respect to 6 CEO and president/CEO succession planning at Fifth Third 7 Bank? 8 A. I've never had a conversation with the board, 9 and the board's never asked me anything with respect to 10 someone's age. It's based on the merits of their 11 qualifications to elevate to higher levels in the 12 organization and potentially CEO. 13 Q. Do you believe it would be inappropriate for 14 the board to make a decision based upon the president or 15 CEO succession and use age as a factor? 16 MR. CIOFFI: Objection. Asked and answered. 17 He said it wasn't a factor. You can answer it 18 again, if you can. 19 THE WITNESS: Wasn't a factor. 20 BY MR. SABA: 21 Q. That wasn't my question. I didn't ask if it 22 was a factor. I'm asking if you believe it would be 23 inappropriate for the board to use age as a factor with 24 respect to succession planning of the president or CEO 25 at Fifth Third Bank.</p>	<p>Page 64</p> <p>1 question. There's nothing in testimony that says 2 he believed that. 3 THE WITNESS: It's the board's decision on who 4 becomes the CEO. My beliefs are irrelevant in this 5 case; it's the board's decision. And the board may 6 factor in, in their decision, the longevity of an 7 individual in that position, not based on age but 8 could be because the individual only wants to work 9 two or three more years. That might be a factor in 10 their decision to put someone in that role because 11 it takes time to put someone in that role; it takes 12 time for them to develop into that role. It takes 13 time to have the next successor brought forth in 14 that role. 15 So if that individual only wants to work three 16 or four more years, the board would consider 17 something like that, all right? But they wouldn't 18 consider age beyond that. That's really a 19 timeline, not an age thing. 20 BY MR. SABA: 21 Q. If you could turn to paragraph 13 of the 22 counterclaim, page 22. It reads, in addition, multiple 23 executives conferred with plaintiff that Mr. Spence was 24 being vetted for president/CEO succession purposes. At 25 no time did plaintiff object or state that he,</p>
<p>Page 65</p> <p>1 MR. CIOFFI: Objection. Completely redundant. 2 You asked if it was a factor, he said it wasn't a 3 factor. Now you're asking him again. 4 MR. SABA: I'm asking him. No, no, no. 5 That's not my question. You can answer whatever 6 question you want to in your own mind, Michael. 7 BY MR. SABA: 8 Q. My question is, is it inappropriate, in your 9 opinion, for the bank to use -- excuse me. 10 Is it inappropriate, in your opinion, for the 11 board to use age as a factor with respect to succession 12 planning of the president or CEO at Fifth Third Bank? 13 A. The board never used age as a factor. I never 14 had to reason to be concerned about that because it was 15 never brought up, never a factor. And I wouldn't expect 16 them to make it a factor. I understand it's about 17 qualifications, not about age, so would it be 18 inappropriate? Absolutely. But it was never discussed 19 because it was never brought forth. 20 Q. You did recognize that, with respect to CEO 21 and president succession planning at Fifth Third Bank, 22 that it was important to make sure that the candidate 23 had a long enough runway to be able to take on that 24 position; is that right? 25 MR. CIOFFI: Objection to the form of the</p>	<p>Page 66</p> <p>1 plaintiff, should be president or should be CEO. 2 Do you see that? 3 A. I do. 4 Q. Who are the "multiple executives"? 5 A. They would have been the other executives that 6 were part of the vetting process, would have been Tim 7 Spence's peers. 8 Q. Do you recall specifically who those multiple 9 executives were? 10 A. I know Tayfun Tuzun was one of those 11 individuals. I believe Lars Anderson was one of those 12 individuals. I believe Bob Shaffer may have been one of 13 those individuals. I'm speculating, but there is a list 14 of, I think, you know, six, seven individuals that were 15 considered peers that were vetted in this process. I 16 don't have that list in front of me. 17 Q. And when did these individuals confer with 18 Phil McHugh that Mr. Spence was being vetted for 19 president and CEO succession purposes? 20 A. It's my understanding that conversations 21 occurred that -- when Tim was going through the process, 22 my understanding, from an individual -- that an 23 individual was asked what the process was for. An 24 individual also had conversations with Phil and was 25 clear that it was -- they all understood that this was</p>
<p>Page 67</p>	<p>Page 67</p>

<p>Page 68</p> <p>1 about vetting Tim as a potential president.</p> <p>2 Once again, I made that clear to each of them,</p> <p>3 that this vetting process and this assessment was about</p> <p>4 Tim becoming president. So it wasn't a secret.</p> <p>5 Everyone understood what this was about that he was</p> <p>6 going to be vetted, and his peers knew he was being</p> <p>7 vetted for the president, including Phil McHugh, who, by</p> <p>8 the way, never came to me and said, why not me? What's</p> <p>9 going on? Why am I not being vetted?</p> <p>10 Once again, all the peers were communicated he</p> <p>11 was being vetted as the potential president. Did they</p> <p>12 talk among themselves? I believe they did; I heard</p> <p>13 that. I don't have that documented, but comments were</p> <p>14 made to me that we all knew what was going on.</p> <p>15 Q. Who made those comments to you?</p> <p>16 A. Jamie Leonard made those comments; Tayfun</p> <p>17 Tuzun would have made those comments to me.</p> <p>18 Q. When did Jamie Leonard and Tayfun Tuzun make</p> <p>19 these comments to you?</p> <p>20 A. Jamie's comment was made to me weeks after --</p> <p>21 weeks after -- a week or so after Phil left -- somewhere</p> <p>22 shortly thereafter when Phil walked out and quit.</p> <p>23 Q. Had a lawsuit already been filed?</p> <p>24 A. I don't know what the time exactly was, to be</p> <p>25 honest with you.</p>	<p>Page 70</p> <p>1 succession purposes. And you referred to Bob Shaffer,</p> <p>2 Lars Anderson, Tayfun Tuzun and Jamie Leonard.</p> <p>3 I asked you, when did these conversations</p> <p>4 occur; when did you become aware of them? You</p> <p>5 identified two conversations, one with Jamie Leonard and</p> <p>6 Tayfun Tuzun. I'm wondering if you can identify any</p> <p>7 other conversations with any other executives who</p> <p>8 indicated that Phil McHugh knew that Tim Spence was</p> <p>9 being vetted for president and CEO.</p> <p>10 MR. CIOFFI: Wait. By way of objection, that</p> <p>11 was a long question, which I couldn't follow.</p> <p>12 Could you just read the whole question back?</p> <p>13 (Record was read.)</p> <p>14 MR. CIOFFI: Objection to the form of the</p> <p>15 question because it's several questions. But if</p> <p>16 you can answer, you may. Go ahead.</p> <p>17 THE WITNESS: Obviously, Bob Shaffer was --</p> <p>18 was -- was having conversations. Once again,</p> <p>19 when -- when Phil quit the bank and refused to do</p> <p>20 the consumer job -- which is a top five job in the</p> <p>21 company, all right, which is substantially</p> <p>22 different than -- than -- than the position was</p> <p>23 prior -- it was never about him not becoming the</p> <p>24 president or CEO. All right? He walked out and</p> <p>25 said, I won't report to Tim Spence. I'm not going</p>
<p>Page 69</p> <p>1 Q. And what specifically did Jamie Leonard say?</p> <p>2 A. It was -- it was in conversation that, not</p> <p>3 sure what's going on. We all knew that -- that Tim was</p> <p>4 being vetted for the president. Not sure what the issue</p> <p>5 is here. Something to that extent. I didn't write it</p> <p>6 down. I don't know exactly verbatim. But indicating</p> <p>7 that they had -- that they were aware. Of course they</p> <p>8 were aware because they were -- they were told.</p> <p>9 Q. And what did Tayfun Tuzun say to you?</p> <p>10 A. When Phil refused to do the job and quit --</p> <p>11 and I'm not sure the exact timing of that -- Tayfun was</p> <p>12 in my office and said, hey, we all knew what was going</p> <p>13 on. This is the -- he knew what was going on. This is</p> <p>14 not a -- this is not a surprise. Everyone knew what was</p> <p>15 going on. We were all part of the process. Something</p> <p>16 to that extent. I don't -- I didn't record it; I didn't</p> <p>17 write it down.</p> <p>18 Q. Do you recall any other conversations with --</p> <p>19 do you recall any other conversations regarding what</p> <p>20 Phil McHugh knew with anyone other than Jamie Leonard or</p> <p>21 Tayfun Tuzun?</p> <p>22 A. Repeat the question, please?</p> <p>23 Q. Sure. You were identifying the multiple</p> <p>24 executives that you believe conferred with Mr. McHugh</p> <p>25 regarding Mr. Spence being vetted for president and CEO</p>	<p>Page 71</p> <p>1 to do the consumer job. I refuse it -- he refused</p> <p>2 to do the job he was offered; he refused to work</p> <p>3 for Tim Spence. All right?</p> <p>4 Had nothing ever to do about him should have</p> <p>5 been the CEO, could have been the CEO, or promised</p> <p>6 the CEO. That was an after the fact once the --</p> <p>7 and when the suit was filed, that was the first I</p> <p>8 became aware that he believed that. And at the end</p> <p>9 of the day, that was an afterthought. It was never</p> <p>10 ever part of any conversation.</p> <p>11 BY MR. SABA:</p> <p>12 Q. Referring to paragraph 14, the counterclaim.</p> <p>13 It reads, at the bank's September 2020 board meeting,</p> <p>14 Fifth Third Bank's board of directors met with the</p> <p>15 executive development agency to discuss the vetting of</p> <p>16 Mr. Spence. Plaintiff was aware of this meeting.</p> <p>17 When the executive development agency meets</p> <p>18 with the board to discuss the vetting of Mr. Spence,</p> <p>19 who's present at that board meeting?</p> <p>20 A. Well, it would have been the board. It would</p> <p>21 have been the -- Bob Shaffer would have most likely been</p> <p>22 there. I can't remember exactly. Myself, I would have</p> <p>23 been there for that -- for that review. Good chance we</p> <p>24 would have had -- Susan Zaunbrecher potentially could</p> <p>25 have been there. Myself and Bob would have definitely</p>